## IN THE UNITED STATES BANKRUPTCY COURT FOR THE EASTERN DISTRICT OF PENNSYLVANIA

IN RE: Daren James Albanese Catherine Yvonne Albanese

**Debtors** 

**CHAPTER 7** 

The Bank of New York Mellon, successor trustee to JPMorgan Chase Bank, N.A., as trustee on behalf of the registered holders of Bear Stearns Asset Backed Securities 2006-SD3, Asset-Backed Certificates, Series 2006-SD3, its successors and/or assigns

**Moving Party** 

vs.

Daren James Albanese Catherine Yvonne Albanese

**Debtors** 

Michael H. Kaliner

Trustee

11 U.S.C. Section 362

NO. 16-15059 REF

## **PRAECIPE TO WITHDRAW**

## TO THE CLERK OF THE BANKRUPTCY COURT:

Kindly withdraw the Motion for Relief of The Bank of New York Mellon, successor trustee to JPMorgan Chase Bank, N.A., as trustee on behalf of the registered holders of Bear Stearns Asset Backed Securities 2006-SD3, Asset-Backed Certificates, Series 2006-SD3, which was filed with the Court on or about October 19, 2016.

The withdrawal is being requesting with the concurrence of Debtors' counsel.

Respectfully submitted,

/s/ Joshua I. Goldman, Esquire\_

Joshua I. Goldman, Esquire Thomas Puleo, Esquire Attorneys for Movant/Applicant KML Law Group, P.C.

Main Number: (215) 627-1322

November 11, 2016